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8 *Attorneys for Defendant*
9 *Sam's West, Inc.*

10 UNITED STATES DISTRICT COURT

11 DISTRICT OF NEVADA

12 RUSSELL B. MORRISON,

13 Plaintiff,

14 v.

15 SAM'S WEST, INC., a foreign corporation, dba
16 SAM'S CLUB; DOES I through X; and ROE
CORPORATIONS I through X, inclusive,

17 Defendants.

Case No: 2:18-cv-00353-RFB-BNW

STIPULATION AND PROPOSED ORDER
TO FILE RESPONSE TO PLAINTIFF'S
MOTION IN LIMINE TO PRECLUDE
DEFENDANT FROM ARGUING OR
REFERENCING PRIOR UNRELATED
INCIDENT INVOLVING PLAINTIFF'S
EXPERT, JOHN PETERSON, AT TRIAL
(ECF NO. 46)

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20 Plaintiff RUSSELL B. MORRISON ("Plaintiff") and Defendant SAM'S WEST, INC. and
21 ("Defendant") by and through their respective counsel of record, do hereby stipulate for an extension
22 of time for Defendant to respond to Plaintiff's *Motion in Limine to Preclude Defendant from Arguing*
23 *or Referencing Prior Unrelated Incident Involving Plaintiff's Expert, John Peterson, at Trial* (ECF
24 No. 46), up to and including July 17, 2019.

25 Pursuant to Local Rule 2.25, the parties hereby aver that this is the first request for such
26 extension of time to respond to the Motion in Limine (ECF No. 46).

27 The parties aver, pursuant to Local Rule 2.25, that good cause exists for the requested
28 extension.

1 The parties aver that this request for extension of time to respond to the Motion in Limine
2 (ECF No. 46) is made in good faith and not for the purpose of delay.

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4 DATED this 10th day of July, 2019.

DATED this 10th day of July, 2019.

5
6 /s/ Andrew Barton

/s/ Timothy D. Kuhls

7 MICHAEL D. HAIGHT, ESQ.
Nevada Bar No. 5654
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11 *Attorneys for Plaintiff*
12 *Russell B. Morrison*

Attorneys for Defendant
Sam's West, Inc.

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15 **IT IS SO ORDERED:**


16 RICHARD F. BOULWARE, II
17 UNITED STATES DISTRICT JUDGE

18 DATED this 11th day of July, 2019.
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